

Exhibit Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DONNA SINGER

I, Donna Singer, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was working on the 63rd Floor of the South Tower when the terrorist attacks of the World Trade Center Towers occurred.

4. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

5. When the passenger plane struck our tower, I was working on the 63rd Floor of World Trade Center Tower #2. I heard the plane hit the first Tower and felt the collision shake the second. When I looked outside, I saw the building burning. Because I was in the Tower when the bombing happened seven years prior to the September 11th attacks, I knew my worst fears had been realized. I immediately headed for the stairs to get down to the lobby. When I was in the stairway at approximately the 17th Floor, the second plane hit the South Tower. Though I was five months pregnant at the time, I continued to the mezzanine level as fast as I could. When I arrived at the lobby, I was disoriented due to the smoke and could not find the doors. The smoke had completely blocked out the sunlight. I lowered myself to the ground and started crawling in an attempt to see better. Debris was falling from the plane's collision site, landing directly outside the entrance doors. The people in the lobby, including myself, were afraid to leave because we feared we would be struck by falling debris. Despite this danger, I distinctly remember someone around me shouting, "We have to get out. Just run for your life!"

6. Upon leaving the building, there were no emergency medical services, fire department, or police department personnel at the scene. I assumed that they were all at the North Tower. As I was running away from the Towers, I saw blood and body parts strewn across the streets. Because I was in shock, at the time I thought that these were pieces of uncooked meat from the Burger King nearby. I tried to call my husband, who worked in Midtown, but was not able to reach him. None of the phones were working. When the Tower collapsed, I took cover in a gym to escape the falling debris and dust cloud. The manager of the gym let me use his landline to call my husband and parents to let them know that I was not in the Tower when it collapsed. My father, a fireman, told me to stay where I was. He told me that he was going to take a ferry from Staten

Island and come get me. At the time, I did not know if my husband was alive, or if he was near the Tower when it fell.

7. I waited in the gym with others who had taken shelter, including a co-worker that had also escaped the South Tower. We were too afraid to leave. We thought that the city was being bombed. Eventually, my co-worker was able to contact her mother in Brooklyn. We knew we needed to get out of the city, so she and I left the gym and walked to Brooklyn by crossing over the Brooklyn Bridge. My sister-in-law picked me up from Brooklyn and took me to my home on Staten Island. I arrived back home at seven in the evening.

8. Because of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: several complications in my pregnancy, including shortening of the cervix and prematurely dilating due to walking from the 63rd Floor of the South Tower to Brooklyn. Because of these injuries, I was bedridden and monitored by a nurse for the remaining four months of my high-risk pregnancy.

9. Due to these horrific terrorist attacks and the atrocities that I witnessed on 9-11, I also experienced and continue to experience severe PTSD and panic attacks. These panic attacks have caused me to be on disability ever since the attacks. I have seen a psychiatrist for my mental injuries once a month for the past eighteen years. I have suffered and continue both physically and mentally due to the traumatic events of these terrorist attacks.

10. I sought medical attention for my above physical and mental injuries.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 9th day of January 2020.



Declarant, Donna Singer

Exhibits Filed Under Seal